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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 : SEARS HOLDINGS CORPORATION, et al., : Case No. 18-23538 (RDD)

Debtors. 1

(Jointly Administered)

(ECF No. 9106)

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NOTICE OF WITHDRAWAL OF THE DEBTORS' MOTION TO COMPEL TURNOVER OF ESTATE PROPERTY

PLEASE TAKE NOTICE that, on November 19, 2020, Sears Holdings

Corporation and certain of its affiliates, as debtors and debtors in possession in the above-captioned

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is c/o M-III Partners, LP, 1700 Broadway, 19th Floor, New York, NY 10019.

chapter 11 cases (collectively, the "Debtors"), filed the Motion of Debtors to Compel Turnover of

Estate Property [ECF No. 9106] (the "Turnover Motion") for entry of an order compelling

Transform Holdco LLC ("Transform") to turn over estate funds, pursuant to section 541 and 542

of chapter 11 of title 11 of the United States Code.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Order

Authorizing and Approving Procedures for Settling De Minimis Affirmative Claims and Causes of

Action of the Debtors [ECF No. 3363] the Debtors and Transform have reached a settlement

resolving the Turnover Motion.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby withdraw the

Turnover Motion with prejudice.

Dated: January 22, 2021

New York, New York

/s/ Jacqueline Marcus

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2